United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5	3 DE0100102 11	12 13 04 25 17	18 S	19 S	20 2

Remarks

21 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 69	70	71	72	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

Allen Harim Foods, LLC
18752 Harbeson Rd P.O. Box 277
Harbeson, DE 19951

Entry Time/Date	Permit Effective Date
0900 hrs 4/25/13	05/01/06
Exit Time/Date	**Permit Expiration Date**
1330 hrs 4/25/13	04/30/11

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Michael Sause - Level IV ARC 302-359-1975 (c)
Jeff Bailey - Level IV
302-684-1640 (o) 302-684-1638 (f)

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

Name, Address of Responsible Official/Title/Phone and Fax Number

Scott Yackel - Plant Mgr
same address
302-684-1640 x126

Contacted ☑ Yes ☐ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☑ Permit	☑ Self-Monitoring Program	☐ Pretreatment	☐ MS4
☑ Records/Reports	☐ Compliance Schedules	☑ Pollution Prevention	
☑ Facility Site Review	☑ Laboratory	☑ Storm Water	
☑ Effluent/Receiving Waters	☑ Operations & Maintenance	☐ Combined Sewer Overflow	
☑ Flow Measurement	☑ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
☐☐☐☐☐	
☐☐☐☐☐	
☐☐☐☐☐	
☐☐☐☐☐	

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Nicole Smith /Nicole Smith	DNREC 302-739-9946	4/25/13
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
	DNREC 302.739.9946	5-28-13

Form Approved
OMB No. 158 - R0073

Sections F thru L: Complete on all inspections, as appropriate. N/A = Not Applicable	PERMIT NO. NE 0002399

SECTION F - Facility and Permit Background

ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY *(Including City, County and ZIP code)*	DATE OF LAST PREVIOUS INVESTIGATION BY EPA/STATE: 4/30/12 FINDINGS: See Report

SECTION G - Records and Reports

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. ☑ YES ☐ NO ☐ N/A *(Further explanation attached _____)*

DETAILS:

(a) ADEQUATE RECORDS MAINTAINED OF:			
(i) SAMPLING DATE, TIME, EXACT LOCATION	☑ YES	☐ NO	☐ N/A
(ii) ANALYSES DATES, TIMES	☑ YES	☐ NO	☐ N/A
(iii) INDIVIDUAL PERFORMING ANALYSIS	☑ YES	☐ NO	☐ N/A
(iv) ANALYTICAL METHODS/TECHNIQUES USED	☑ YES	☐ NO	☐ N/A
(v) ANALYTICAL RESULTS *(e.g., consistent with self-monitoring report data)*	☑ YES	☐ NO	☐ N/A
(b) MONITORING RECORDS *(e.g.,flow, pH, D.O., etc.)* MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS *(e.g. continuous monitoring instrumentation, calibration and maintenance records)*.	☑ YES	☐ NO	☐ N/A
(c) LAB EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS KEPT.	☑ YES	☐ NO	☐ N/A
(d) FACILITY OPERATING RECORDS KEPT INCLUDING OPERATING LOGS FOR EACH TREATMENT UNIT.	☑ YES	☐ NO	☐ N/A
(e) QUALITY ASSURANCE RECORDS KEPT.	☑ YES	☐ NO	☐ N/A
(f) RECORDS MAINTAINED OF MAJOR CONTRIBUTING INDUSTRIES *(and their compliance status)* USING PUBLICLY OWNED TREATMENT WORKS.	☐ YES	☐ NO	☑ N/A

SECTION H - Permit Verification

INSPECTION OBSERVATIONS VERIFY THE PERMIT. ☑ YES ☐ NO ☐ N/A *(Further explanation attached _____)*

DETAILS:

(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE.	☑ YES	☐ NO	☐ N/A
(b) FACILITY IS AS DESCRIBED IN PERMIT.	☑ YES	☐ NO	☐ N/A
(c) PRINCIPAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMIT APPLICATION.	☑ YES	☐ NO	☐ N/A
(d) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION.	☑ YES	☐ NO	☐ N/A
(e) NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES.	☐ YES	☐ NO	☑ N/A
(f) ACCURATE RECORDS OF RAW WATER VOLUME MAINTAINED.	☐ YES	☑ NO	☐ N/A
(g) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT.	☑ YES	☐ NO	☐ N/A
(h) CORRECT NAME AND LOCATION OF RECEIVING WATERS.	☑ YES	☐ NO	☐ N/A
(i) ALL DISCHARGES ARE PERMITTED.	☑ YES	☐ NO	☐ N/A

SECTION I - Operation and Maintenance

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. ☑ YES ☐ NO ☐ N/A *(Further explanation attached _____)*

DETAILS:

(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED. No Power - No Flow	☐ YES	☑ NO	☐ N/A
(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	☑ YES	☐ NO	☐ N/A
(c) REPORTS ON ALTERNATE SOURCE OF POWER SENT TO EPA/STATE AS REQUIRED BY PERMIT.	☐ YES	☐ NO	☑ N/A
(d) SLUDGES AND SOLIDS ADEQUATELY DISPOSED.	☑ YES	☐ NO	☐ N/A
(e) ALL TREATMENT UNITS IN SERVICE.	☑ YES	☐ NO	☐ N/A
(f) CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND MAINTENANCE PROBLEMS. BP Environ.	☑ YES	☐ NO	☐ N/A
(g) QUALIFIED OPERATING STAFF PROVIDED.	☑ YES	☐ NO	☐ N/A
(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS. OJT, DTCC, DEWA	☑ YES	☐ NO	☐ N/A
(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS.	☑ YES	☐ NO	☐ N/A
(j) INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR EQUIPMENT.	☑ YES	☐ NO	☐ N/A
(k) OPERATION AND MAINTENANCE MANUAL MAINTAINED. Last update DEC 2012	☑ YES	☐ NO	☐ N/A
(l) SPCC PLAN AVAILABLE. Last Update 12/2011	☑ YES	☐ NO	☐ N/A
(m) REGULATORY AGENCY NOTIFIED OF BY PASSING. *(Dates _____ _____)*	☐ YES	☐ NO	☑ N/A
(n) ANY BY-PASSING SINCE LAST INSPECTION.	☐ YES	☑ NO	☐ N/A
(o) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED.	☐ YES	☑ NO	☐ N/A

PERMIT NO. DE 0000299

SECTION J - Compliance Schedules

PERMITTEE IS MEETING COMPLIANCE SCHEDULE. ☐ YES ☐ NO ☑ N/A *(Further explanation attached ____)*

CHECK APPROPRIATE PHASE(S):

- ☐ (a) THE PERMITTEE HAS OBTAINED THE NECESSARY APPROVALS FROM THE APPROPRIATE AUTHORITIES TO BEGIN CONSTRUCTION.
- ☐ (b) PROPER ARRANGEMENT HAS BEEN MADE FOR FINANCING *(mortgage commitments, grants, etc.)*.
- ☐ (c) CONTRACTS FOR ENGINEERING SERVICES HAVE BEEN EXECUTED.
- ☐ (d) DESIGN PLANS AND SPECIFICATIONS HAVE BEEN COMPLETED.
- ☐ (e) CONSTRUCTION HAS COMMENCED.
- ☐ (f) CONSTRUCTION AND/OR EQUIPMENT ACQUISITION IS ON SCHEDULE.
- ☐ (g) CONSTRUCTION HAS BEEN COMPLETED.
- ☐ (h) START-UP HAS COMMENCED.
- ☐ (i) THE PERMITTEE HAS REQUESTED AN EXTENSION OF TIME.

SECTION K - Self-Monitoring Program

Part 1 – Flow measurement *(Further explanation attached ____)*

PERMITTEE FLOW MEASUREMENT MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT.	☑ YES	☐ NO	☐ N/A
DETAILS:			
(a) PRIMARY MEASURING DEVICE PROPERLY INSTALLED. w/ Ultra Sonic	☑ YES	☐ NO	☐ N/A
TYPE OF DEVICE: ☐ WEIR ☑ PARSHALL FLUME ☐ MAGMETER ☐ VENTURI METER ☐ OTHER *(Specify ____)*			
(b) CALIBRATION FREQUENCY ADEQUATE. *(Date of last calibration* 9/12 *)*	☑ YES	☐ NO	☐ N/A
(c) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED.	☑ YES	☐ NO	☐ N/A
(d) SECONDARY INSTRUMENTS *(totalizers, recorders, etc.)* PROPERLY OPERATED AND MAINTAINED.	☑ YES	☐ NO	☐ N/A
(e) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOW RATES.	☑ YES	☐ NO	☐ N/A

Part 2 – Sampling *(Further explanation attached ____)*

PERMITTEE SAMPLING MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT.	☑ YES	☐ NO	☐ N/A
DETAILS:			
(a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	☑ YES	☐ NO	☐ N/A
(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT.	☑ YES	☐ NO	☐ N/A
(c) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT. IF NO, ☐ GRAB ☐ MANUAL COMPOSITE ☐ AUTOMATIC COMPOSITE FREQUENCY ____	☑ YES	☐ NO	☐ N/A
(d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE.	☑ YES	☐ NO	☐ N/A
(i) SAMPLES REFRIGERATED DURING COMPOSITING ICED	☑ YES	☐ NO	☐ N/A
(ii) PROPER PRESERVATION TECHNIQUES USED	☑ YES	☐ NO	☐ N/A
(iii) FLOW PROPORTIONED SAMPLES OBTAINED WHERE REQUIRED BY PERMIT	☑ YES	☐ NO	☐ N/A
(iv) SAMPLE HOLDING TIMES PRIOR TO ANALYSES IN CONFORMANCE WITH 40 CFR 136.3	☑ YES	☐ NO	☐ N/A
(e) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT.	☐ YES	☑ NO	☐ N/A
(f) IF (e) IS YES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT.	☐ YES	☐ NO	☑ N/A

Part 3 – Laboratory *(Further explanation attached ____)*

PERMITTEE LABORATORY PROCEDURES MEET THE REQUIREMENTS AND INTENT OF THE PERMIT.	☑ YES	☐ NO	☐ N/A
DETAILS:			
(a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED. *(40 CFR 136.3)*	☑ YES	☐ NO	☐ N/A
(b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED.	☐ YES	☐ NO	☑ N/A
(c) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED. Process Control	☑ YES	☐ NO	☐ N/A
(d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.	☑ YES	☐ NO	☐ N/A
(e) QUALITY CONTROL PROCEDURES USED.	☑ YES	☐ NO	☐ N/A
(f) DUPLICATE SAMPLES ARE ANALYZED. 25 % OF TIME. pH & TRC 5%	☑ YES	☐ NO	☐ N/A
(g) SPIKED SAMPLES ARE USED. ____ % OF TIME.	☑ YES	☐ NO	☐ N/A
(h) COMMERCIAL LABORATORY USED.	☑ YES	☐ NO	☐ N/A
(i) COMMERCIAL LABORATORY STATE CERTIFIED.	☐ YES	☐ NO	☑ N/A

LAB NAME Envirocorp Labs

LAB ADDRESS Harrington, DE

Form Approved
OMB No. 158.-R0073

PERMIT NO. DE0000299

SECTION L - Effluent/Receiving Water Observations *(Further explanation attached _____)*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOL	COLOR	OTHER
001	No	No	No	NO	No	CLEAR	/
002							
003		No Flow					
004							

(Sections M and N: Complete as appropriate for sampling inspections)

SECTION M - Sampling Inspection Procedures and Observations *(Further explanation attached _____)*

- ☑ GRAB SAMPLES OBTAINED
- ☑ COMPOSITE OBTAINED
- ☑ FLOW PROPORTIONED SAMPLE
- ☑ AUTOMATIC SAMPLER USED
- ☑ SAMPLE SPLIT WITH PERMITTEE
- ☑ CHAIN OF CUSTODY EMPLOYED
- ☑ SAMPLE OBTAINED FROM FACILITY SAMPLING DEVICE

sampled on 5/1/13

COMPOSITING FREQUENCY flow prop. PRESERVATION ICED

SAMPLE REFRIGERATED DURING COMPOSITING: ☑ YES ☐ NO ICE

SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE yes

SECTION N - Analytical Results *(Attach report if necessary)*

- see attached analytical report

WATER COMPLIANCE INSPECTION REPORT
STORM WATER EVALUATION
National Pollutant Discharge Elimination System Permitting Program
Delaware Department of Natural Resources and Environmental Control
Surface Water Discharges Section

Name and location of Facility Inspected Allen's Harim Foods, LLC Harbeson, DE	**Entry Date/Time** 4/25/13 0900 hrs
Facility Permit No. DE 0000299	
Facility Contact Michael Sause	**Exit Date/Time** 4/25/13 1330 hrs

An evaluation of the facility's storm water management program was completed in order to determine whether or not the facility is operating in compliance with regards to the storm water permitting requirements of their NPDES permit. The evaluation consisted of a records review and a visual observation of the facility's storm water management system.

The facility is permitted to discharge storm water from Outfall(s) 002, 003, 004

RECORDS REVIEW	Yes	No	S/C
1) **Storm Water Plan.** Has the facility developed and implemented a Storm Water Plan as required by Part III of their NPDES Permit? What is the date of the current SWP? DEC 2011	✓		
2) **Training.** Training completed annually? Are all employees and contractor personnel that work in areas where industrial materials are used/stored trained to meet the requirements of the SWP?	✓		
3) **Inspection Records.** Are storm water inspections conducted and documented? Please describe. quarterly, semi-annual	✓		
4) **Monitoring Data.** Has the facility performed storm water monitoring as required by the permit?	✓		
5) **Spill and Leaks.** Have any major spills or leaks occurred resulting in a discharge to the storm water conveyance system? If so, are records maintained indicating spills/leaks?		✓	N/A

PHYSICAL INSPECTION	Yes	No	S/C
1) **Storm Water Outfalls.** Are storm water outfalls identified as required?	✓		
Outfalls free of trash/ debris/erosion?	✓		
Any non-storm water discharges occurring?		✓	
2) **Storm Water Conveyance System.** Are catch basins, storm water conveyance systems and storm water treatment facilities cleaned at appropriate intervals? Is the storm water conveyance system free of trash and debris?	✓		
3) **Good Housekeeping Practices.** Are outside areas kept neat and clean? Is process debris removed regularly?	✓		
Is there evidence of leaks/spills?		✓	
Is there evidence of particulate matter or visible deposits and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water discharge?		✓	
4) **Storm Water Pollution:** materials being stored in a manner that minimizes their exposure to storm water?	✓		
5) **Storm Water Visual Observations:** Are the following present in storm water discharges or do the outfalls indicate evidence thereof?			

OUTFALL NUMBER	OIL SHEEN	VISIBLE FOAM	VISIBLE FLOATING SOLIDS	COLOR
001	NO	NO	NO	CLEAR
002, 003, 004	ALL DRY & CLEAN			

COMMENTS

Compliance Status At Time of Inspection: Compliant

Reconnaissance Inspection Required: Yes or (No) **If Yes, an Inspection shall be completed within ___ months.**

Inspector's Printed Name: Nicole Smith

Inspector's Signature: Nicole Smith **Date:** 4/25/13

HORNEY INDUSTRIAL ELECTRONICS

Process Control Technology

CERTIFICATE OF CALIBRATION

Date : September 10, 2012

Allen Harim Foods, LLC
18752 Harbeson Rd.
Harbeson, DE 19951

Purchase Order: 4500107165

Job#:606674

Manfg.	**Serial#**	**Range**
Siemens Hydro 200	PBDC3/20030	0-1200 GPM
H/W DR45AT	C40000000254023	0-1200 GPM

ALL CALIBRATION TRACEABLE TO N.I.S.T. AS PER MANFG. SPECIFICATION

P. O. BOX 700 • BRIDGEVILLE, DELAWARE 19933 • 302-337-3600 • FAX 302-337-8560

STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES AND
ENVIRONMENTAL CONTROL
DIVISION OF WATER

ENVIRONMENTAL
LABORATORY SECTION

89 KINGS HIGHWAY
DOVER, DELAWARE 19901

PHONE: (302) 739-9942
FAX: (302) 739-3491

May 23, 2013

J. Chris Cleaver
DW - Surface Water Discharge Section - NPDES
89 Kings Highway
Dover, DE 19901

Attention: J. Chris Cleaver

Attached you will find the following Laboratory Results:

Order Number:	1305002
Project Description:	DE0000299 Allen Harim Foods
Date Received:	05/01/2013
Time Received:	13:30

If you have any questions regarding this data, please contact me at the above telephone number.

Sincerely,

Kathy A. Knowles
Laboratory Manager

Delaware's good nature depends on you!

Environmental Laboratory Section - Division of Water
Delaware Department of Natural Resources and Environmental Control
89 Kings Highway, Dover, DE 19901 Phone: 302-739-9942

ANALYSIS REPORT

ELS Sample Number:	1305002-001	***Matrix:***	Waste Water
Client Sample Description:	001	***Sampling Method:***	Composite
Site ID:		***Date and Time Collected:***	5/1/2013

Test Parameter	*Method*	*Result*	*Units*	*Qualifier*	*LOQ*	*Analysis Date*
Inorganic Nonmetallic Constituents						
Ammonia as N, Total	USEPA 350.1	0.061	mg/L		0.020	05/01/2013
Nitrogen, Total, Alkaline Persulfate	APHA 4500-P-J	8.37	mg/L		0.100	05/13/2013
Phosphorus, Total, Alkaline Persulfate	APHA 4500-P-J	0.094	mg/L		0.010	05/13/2013
Organic Aggregate Constituents						
BOD, 5-Day (Seeded)	APHA 5210-B	< 1.62	mg/L		2.40	05/07/2013
Physical and Aggregate Properties						
Residue, Nonfilterable (TSS)	APHA 2540-D	8	mg/L		2	05/02/2013

ANALYSIS REPORT

ELS Sample Number:	1305002-002	***Matrix:***	Waste Water
Client Sample Description:	001	***Sampling Method:***	Grab
Site ID:		***Date and Time Collected:***	5/1/2013 10:50

Test Parameter	*Method*	*Result*	*Units*	*Qualifier*	*LOQ*	*Analysis Date*
Aggregate Organic Constituents						
N-Hexane Extractable Material	EPA 1664	< 5.0	mg/L		5.0	05/16/2013
Microbiological Examination						
Enterococcus	USEPA 1600	< 1	cfu/100ml		1	05/02/2013

ANALYSIS REPORT

ELS Sample Number:	1305002-003	***Matrix:***	Waste Water
Client Sample Description:	001-1	***Sampling Method:***	Grab
Site ID:		***Date and Time Collected:***	5/1/2013 10:51

Test Parameter	*Method*	*Result*	*Units*	*Qualifier*	*LOQ*	*Analysis Date*
Microbiological Examination						
Enterococcus	USEPA 1600	< 1	cfu/100ml		1	05/02/2013

Environmental Laboratory Section - Division of Water
Delaware Department of Natural Resources and Environmental Control
89 Kings Highway, Dover, DE 19901 Phone: 302-739-9942

Qualifier Codes, Definitions, and Abbreviations

Qualifier/Flag

<	Sample value is below the method detection limit. The result is reported as < MDL.
>	Sample value is above the upper quantitation limit. The upper quantitation limit is reported.
AB	Air Bubble in DO bottle
B	The parameter was detected in the method blank at a concentration that was both above the LOQ and greater than 10% of the sample concentration.
BT	Secchi disk ON BOTTOM. The reported result is the depth from the surface to the bottom.
C	See report narrative or comment line for observations concerning this result.
D	Sample diluted for analysis.
FB	The parameter was detected in the field blank at a concentration that was both above the LOQ and greater than 10% of the sample concentration.
FZ	Samples frozen prior to analysis
I	The reported value is estimated due to the presence of interference.
IM	Instrument malfunctioned; No measurement reported.
J	Analyte present; reported value is estimated; concentration is below the range for accurate quantitation (greater than the MDL, but less than the LOQ).
JH	Result is likely overestimated due to matrix effect.
JL	Result is likely underestimated due to matrix effect.
LOQ	Limit of Quantitation
MDL	Method Detection Limit
N	This flag indicates presumptive evidence of a compound. This flag is only used for TICs, where the identification is based on a mass spectral library search and must be used in combination with the J flag. It is applied to all TIC results. For generic characterization of a TIC, such as chlorinated hydrocarbon, or for an "unknown" (no matches >= 85%), the "N" flag is not used.
NA	Not Analyzed but required by project workplan or analytical request form.
NBF	No bottom measurement recorded in the field due to shallow water; Bottom records are those measurements recorded at surface.
NC	Sample not collected, but required by the project work plan.
ND	Not Detected.
NE	Field measurement not taken due to uncontrollable field sampling event or Natural Condition (Depth of water too deep/shallow).
NF	Sample collected, but not analyzed by the laboratory due to field error.
NO	None Observed
NR	No Result. See report narrative or comments for explanation.
NV#	Analytical result not valid.
O	Sample outsourced for analysis. Data will be reported separately.
P	Sample not properly preserved in field in accordance with preservation requirements. Data may be suspect.
QC	Quality control value is outside acceptance limits.
QNS	Quantity not sufficient. Not enough sample to perform requested analyses.
S	Results will be reported in a separate report; See attached report.
SD	Sample discarded; Sample collected but not analyzed as per client request.
SNF	Site has no flow (i.e. a dry stream or a stream with no velocity)
STD	Stream too deep
STS	Site is too shallow to sample
TIC	Tentatively identified compound from a GC/MS library search.
U	Compound was analyzed but not detected. The method detection limit is reported.
UR	Unusual result. See narrative for an explanation.
USGS	USGS Gauge
V	Analysis performed after holding time expired.

Environmental Laboratory Section - Division of Water
Delaware Department of Natural Resources and Environmental Control
89 Kings Highway, Dover, DE 19901 Phone: 302-739-9942

Qualifier Codes, Definitions, and Abbreviations

Units

CFS	Cubic Feet per Second.
cfu/100mL	Colony forming units per 100 mL.
G	gram; there are 1000 g in 1 Kg.
GPM	Gallons per minute.
IN	Inches.
Kg	Kilogram.
L	Liter.
mg	milligram; there are 1000 mg in 1 g.
MGD	Millions of Gallons per Day.
ml	milliliter; there are 1000 ml in 1 L.
mpn/100mL	most probable number per 100 mL.
NTU	Nephelometric Turbidity Units. NTU is numerically equivalent to Formazin turbidity unit (FTU).
oC	Celsius.
pCi/L	Pico curie per liter.
ppb	Parts per billion=ug/Kg, ug/L.
ppm	Parts per million=mg/Kg, ug/g, mg/L, ug/ml; 1 ppm=1000 ppb.
su	Standard Units.
ug	microgram; there are 1000 ug in 1 mg.
uL	microliter; there are 1000 ul in 1 ml.
uMhos	Conductivity units for laboratory measurements.
uS	micro siemens; units used to measure conductivity in the field; same as uMhos.

Environmental Laboratory Section - Division of Water
Department of Natural Resources and Environmental Control
89 Kings Highway, Dover, DE 19901 (302) 739-9942

FIELD CHAIN OF CUSTODY

(Complete in BLUE ink)

Page 1 *of* 1

Client : J. Chris Cleaver
Address : 89 Kings Highway
Dover, DE 19901
Phone No.: (302)739-9946

Report To : J. Chris Cleaver
Invoice To : J. Chris Cleaver
Account : NPDES
ELS Order ID : 1305002

PROJECT NAME: Allen Harim DE 0000399

SAMPLERS (Please Print): J. Chris Cleaver

(ELS Use Only) Lab Log No.	Client Sample Description	Sample Date	Sample Time	Matrix*	Comp	Grab	No. Of Containers	TSS BOD	O+G	T Phos	NH3-N	Caffeine				REMARKS
1305002-001	001	5.1	24HR	WW	✓		1	✓		✓	✓					
1305002-002	001	↓	1050	↓		✓	4		✓			✓				
1305002-003	001	↓	1051	↓		✓	1					✓				

RELINQUISHED BY: (*signature*)	DATE	TIME	RECEIVED BY: (*signature*)
C. Cleaver	5.1.13	1330	[signature]

DW - drinking water
ER - equip. rinseate
GW - ground water
Lab - lab water
LW - liquid waste
SE - sediment
SL - sludge
SO - soil
SW - surface water
TI - tissue
WS - solid waste
WW - waste water

COMMENTS:

BOD Cl2

pH 7.2
Cl2 ND

Is laboratory chain-of-custody required? (Yes) / No

ELS USE ONLY
Sample Conditions (circle response):
1. Samples match COC? (Yes)/No 2. Bottles supplied by ELS? (Yes)/No 3. Samples received broken/leaking? Yes/(No) 4. Cooler temp bottle 2-6 degrees? (Yes)/No/NA
5. Properly preserved? (Yes)/No 6. VOA/DO containers free of headspace? Yes/No/(NA) 7. Holding times expired? Yes/(No) 8. Volume sufficient for analysis? (Yes)/No

STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES &
ENVIRONMENTAL CONTROL
DIVISION OF WATER
89 KINGS HIGHWAY
DOVER, DELAWARE 19901

Surface Water Discharges Section

Telephone: (302) 739-9946
Facsimile: (302) 739-8369

April 30, 2013

Allen's Harim Foods, LLC
Mr. Michael Sausé - Wastewater Manager
P.O. Box 277
18752 Harbeson Road
Harbeson, DE 19951

Re: Compliance Sampling & Inspection (CSI) - April 25, 2013
NPDES Permit No. DE-0000299

Dear Mr. Sausé,

On behalf of the State of Delaware, Surface Water Discharges Section, Compliance & Enforcement Branch, I would first like to thank you, Jeff Bailey, Jason Reale, LouAnn Parson, and Roy Barger for the cooperation and assistance given during the Compliance Sampling & Inspection (CSI) completed at your facility on April 25, 2013.

Laboratory records, reagents, instrumentation, and methods were reviewed and found to be in accordance with NPDES requirements. The January 2013 Discharge Monitoring Report (DMR) was reviewed and all entries traced back to raw data. Outfall 001 was inspected and the effluent quality looked very good. Overall, the housekeeping was excellent and everyone at the Harbeson facility is to be complimented for their efforts.

During this inspection, a comprehensive Storm Water Evaluation was also completed and overall compliance was very good. A review of the SWPP and SPCC plans showed that all inspections and training are up to date. The outfalls were inspected and were clean and dry at the time of inspection. The new sampling station at Outfall 002 has been installed and was inspected as well.

During this CSI, there were no observable deficiencies and everyone at Allen's Harim Foods is to be commended for their efforts.

I would like to again thank you for your cooperation and participation in this Compliance Sampling & Inspection program to help assure the quality of NPDES effluent waters and the self-reporting data. If you have any questions, please contact Glenn Davis or me at 302-739-9946.

Sincerely,

Nicole L. Smith

Nicole L. Smith
Senior Environmental Compliance Specialist
Compliance & Enforcement Branch
Surface Water Discharges Section
State of Delaware – DNREC

Ecopy: Mr. Bryan Ashby – DNREC
Mr. Glenn Davis - DNREC

Allen Harim Foods, LLC
Harbeson, Delaware Plant
Annual Compliance Sampling and Inspection
April 25, 2013

On Thursday, April 25, 2013, Nicole Smith of the State of Delaware, Department of Natural Resources and Environmental Control, Division of Water, Surface Water Discharges Section, Compliance & Enforcement Branch, completed a Compliance Sampling and Inspection of the Allen Harim Foods, LLC, Harbeson Wastewater Treatment Plant (WWTP). Nicole Smith is the Senior Environmental Compliance Specialist for the Compliance & Enforcement Branch.

The inspector arrived at the Harbeson, Delaware facility at approximately 0900 hrs., presented her identification to the security guard on duty, and informed him that she was there to see Mr. Michael Sause' for the purpose of completing an inspection of the Wastewater Treatment Plant. After receiving a visitor ID badge, the inspector drove to the WWTP, where she met with Mr. Michael Sause' (WWTP Supervisor), Mr. Jason Reale (Corporate Project Engineer), Mr. Roy Barger (Maintenance Manager), Ms. Lou Ann Parson (President, BP Environmental, Inc.), and Mr. Jeff Bailey (WWTP Senior Operator). After a short pre-inspection meeting, the inspector made a thorough inspection of the entire WWTP and included a review of the facility's storm water management practices.

WWTP Process

The Harbeson, Delaware Plant is a poultry processing plant that utilizes an activated sludge process, with anoxic/oxic ponds, clarifiers, dissolved air floatation (DAF), filter press, chlorination, and dechlorination. Poultry processing wastewater is pumped to the DAF where first stage solids are removed and sent to a holding tank. These solids are removed by Enviro Organic Technologies (EOT) for recycling in by-products. Effluent from the DAF is treated with Magnesium Oxide for alkalinity control and is then pumped to two (2) "Anoxic Ponds" (1.5 million gallons each), where it goes through a series of aeration/no aeration for nutrient removal and first stage organic reduction. Sanitary waste from the production facility is also pumped directly to the "Anoxic Ponds" and is co-mingled with the poultry processing wastewater.

From the "Anoxic Ponds", the wastewater flows to a Complete Mix Activated Sludge (CMAS) Tank #1 that has a capacity of approximately 1.6 M gallons. From CMAS #1, the activated sludge is gravity fed to CMAS #2 and is treated with Aluminum Chloride during the transfer for phosphorus removal. Flow is then gravity fed to the Circular Clarifier (polymer is added between CMAS #2 and the Clarifier to aide in solids settling). Effluent from the Circular Clarifier then goes to an old rectangular clarifier for further solids settling and then to the concrete labyrinth style chlorine contact chamber. Metered Sodium Hypochlorite is used for disinfection (chlorination) and Sodium Bisulfite is used for dechlorination.

Waste Activated Sludge (WAS) from the clarifiers is sent to two (2) Aerobic Digesters. After settling/decanting, the sludge from the Aerobic Digesters is pumped to a sludge filter press for processing.

Filtrate from the filter press operation is sent to the "Anoxic Ponds" for treatment, and the sludge cake is picked up by Clean Delaware, Incorporated (CDI) and land applied (by permit). Sludge hauling permits for EOT and CDI were both documented and confirmed. Treated and disinfected water from the treatment process is discharged via Outfall 001 to Beaver Dam Creek which discharges to the Broadkill River.

Storm Water Pollution Protection

Allen Harim Foods, LLC does maintain an approved Storm Water Pollution Protection Plan; last update/review was December, 2011. There have not been any reportable spills in the past year, and all chemical and oil tank storage was found to be acceptable (no evidence of any spillage or problems), and most drum/tote storage is inside or under cover.

Outfall 002 & Outfall 003 are located just outside of the "Live Hold" Area (area where the birds remain in their transporting cages and on the flatbed trailer until processing is ready to move them into the production queue). Storm water runoff from the area around the live hold area flows to each of these two permitted storm water outfalls where it is captured in a sump and pumped to the "Anoxic Ponds" for treatment through the WWTP. The live hold area has a slanted concrete floor that contains two (2) collection sumps that pump to the Outfall 003 sump area (and ultimately to the "Anoxic Ponds"). Allen Harim Foods and the Department continue to actively work on the issues regarding the "Live Hold" area.

Outfall 004 is an area that basically collects all rain water runoff from the large parking lots and outside areas of the buildings. At the back of the property a concrete retaining wall with a weir utilized for storm water runoff flow control and to assure that any blown-around trash does not exit the outfall area.

Spill Prevention Control & Countermeasures Plan (SPCC)

The Allen Harim Foods, LLC Harbeson, Delaware facility does maintain an SPCC Plan on site and the plan was last updated and reviewed in December, 2011. There have not been any reportable spills in the past year, and all chemical and oil tank storage was found to be acceptable (no evidence of any spillage or problems), and most drum storage is inside or under cover.

General

It was noted that the facility has a beneficial reuse in place for approximately 20% of the treated wastewater from the WWTP. The reuse water is used for wash down of floors and various "Industrial Water" uses throughout the plant. The wash water is recovered and sent back through the WWTP for treatment.

There is a large lagoon in the back of the property that is available in case of an extreme emergency, where the WWTP can redirect the treated effluent to this lagoon. This lagoon currently has some rain water in it, but nothing is piped or directed to the lagoon . . . basically just "Rain From The Sky" and whatever rain water may runoff from the surrounding wooded area. When the water level in this lagoon becomes too high, the operating personnel have the ability to open a valve and send the water to the DAF influent pit and through the treatment process.

Violations/Observations/Recommendations

- An inspection of the treated wastewater at the sample and discharge points showed that the effluent was clear, with no odor, no sheen, no foam, and no floating solids.
- Outfalls 002, 003, and 004 were clean and dry at the time of inspection.
- The Discharge Monitoring Report (DMR) for January 2013 was reviewed. All data was checked back to the raw laboratory data (in-house and contract lab – Envirocorp, Harrington, DE) and all calculations were verified. All testing methods, holding times, preservations, and container types were verified as conforming to 40 CFR Part 136.
- The inspection team requested a sample taken of the effluent (Outfall 001) at a point following chlorination, but just prior to dechlorination and at the designated sample point. A pH analysis was run on the discharge sample. The analysis was reported as 7.3, well within the permit limitation of 6.0 – 9.0 standard units. The pH procedures were reviewed with the operator and all buffers used were found to have acceptable expiration dates: 4.0 – 1/15; 7.0 – 5/14; 10.0 – 10/14. TRC analysis was run on both samples. The analysis was reported as 1.77 for the pre-dechlor sample and Non-Detect (ND) on the discharge sample. DPD packets used for TRC analysis had an expiration date of 5/17.
- The inspector found the housekeeping to be very acceptable.
- Sludge records and hauling permits were reviewed and found to be in compliance.
  -CDI hauling permit DE WH-013 valid 9/26/11-9/25/16
  -EOT hauling permit DE OH-601 valid 10/28/08-10/27/13
- In response to last year's CSI, the facility has been documenting rain events in the log book. When rain events occur, the staff checks the outfalls for discharges and checks the sump pumps to ensure they are working properly to avoid a discharge. In the past year when discharges have occurred, the facility has conducted the required sampling when it has been safe to do so.
- Operations & Maintenance Manuals have been completely reviewed and reorganized. Review/update was completed in December 2012 with management certification.
- SWPP and SPCC plans were reviewed: last review/update was December 2011 and inspections and training are up to date for both plans as well.

A closing meeting was held with all parties involved in the compliance inspection, and a review of the preliminary findings was completed. Mr. Sause' was informed that he would be receiving a follow-up letter and a copy of the inspection report at a later date.

The inspector departed the facility at approximately 1330 hrs.

Nicole L. Smith

Nicole L. Smith
Senior Environmental Compliance Specialist
Compliance & Enforcement Branch
Surface Water Discharges Section
Division of Water
State of Delaware – DNREC